

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

WELLCOMEMAT, LLC,

Plaintiff,

v.

AYLO HOLDINGS S.à r.l., AYLO  
FREESITES LTD, AYLO PREMIUM,  
LTD, 9219-1568 QUEBEC, INC., and  
JARROD BELTRAN,

Defendants.

C.A. No. 2:23-cv-483

**JURY TRIAL DEMANDED**

**DECLARATION OF GEORGE R. EL-KHOURY IN SUPPORT OF  
PLAINTIFF WELLCOMEMAT LLC'S MOTION FOR LEAVE TO  
SUPPLEMENT INFRINGEMENT CONTENTIONS**

I, George R. El-Khoury, declare as follows:

1. I am an attorney with Susman Godfrey, LLP and a member of the New York state bar. I represent Plaintiff WellcomeMat LLC ("Plaintiff" or "WellcomeMat") in the above-captioned case against the Aylo Defendants ("Defendants" or "Aylo"). I submit this declaration in support of WellcomeMat's Motion for Leave to Supplement Infringement Contentions.

2. Attached as Exhibit 1 is a true and correct copy of a redline of the Cover Pleading to Plaintiff's First Supplemental Disclosure of Asserted Claims and Infringement Contentions Pursuant to Local Patent Rules 3-1 and 3-2, served on June 10, 2024.

3. Attached as Exhibit 2 is a true and correct copy of a redline of the Claim Chart attached to Plaintiff's First Supplemental Disclosure of Asserted Claims and Infringement Contentions Pursuant to Local Patent Rules 3-1 and 3-2, served on June 10, 2024.

4. Attached as Exhibit 3 is a true and correct copy of a clean version of the Cover Pleading to Plaintiff's First Supplemental Disclosure of Asserted Claims and Infringement

Contentions Pursuant to Local Patent Rules 3-1 and 3-2, served on June 10, 2024.

5. Attached as Exhibit 4 is a true and correct copy of a clean version the Claim Chart attached to Plaintiff's First Supplemental Disclosure of Asserted Claims and Infringement Contentions Pursuant to Local Patent Rules 3-1 and 3-2, served on June 10, 2024.

6. Attached as Exhibit 5 is a true and correct copy of the Cover Pleading to Plaintiff's Disclosure of Asserted Claims and Infringement Contentions pursuant to Local Patent Rules 3-1 and 3-2, served on March 11, 2024.

7. Attached as Exhibit 6 is a true and correct copy of the Claim Chart attached to Plaintiff's Disclosure of Asserted Claims and Infringement Contentions pursuant to Local Patent Rules 3-1 and 3-2, served on March 11, 2024.

8. Attached as Exhibit 7 is a true and correct copy of excerpts of an email chain between counsel for WellcomeMat and counsel for Aylo from April 23, 2024, to May 9, 2024.

9. Attached as Exhibit 8 is a true and correct copy of excerpts of an email chain between counsel for WellcomeMat and counsel for Aylo from March 20, 2024, to April 26, 2024.

10. Attached as Exhibit 9 is a true and correct copy of excerpts of an email chain between counsel for WellcomeMat and counsel for Aylo from June 10, 2024, to June 27, 2024.

11. Attached as Exhibit 10 is a true and correct copy of U.S. Patent No. 8,307,286 B2.

12. Attached as Exhibit 11 is a true and correct copy of excerpts of Plaintiff's Venue-Related Interrogatories to Aylo, served on February 13, 2024.

13. Attached as Exhibit 12 is a true and correct copy of excerpts of Defendants' Objections and Responses to Plaintiff WellcomeMat's First Set of Requests for Production (Nos. 1-5), served on March 14, 2024.

14. Attached as Exhibit 13 is a true and correct copy of the Defendants' Objections and Responses to Plaintiff WellcomeMat's First Set of Interrogatories (Nos. 1-3), served on March 14,

2024.

15. Attached as Exhibit 14 is a true and correct copy of a redacted article appearing on Aylo's Pornhub website as of June 27, 2024. Redactions were made to remove pornographic content.

16. Attached as Exhibit 15 is a true and correct copy of redacted excerpts of the Pornhub Playbook appearing on Aylo's Pornhub website as of June 27, 2024. Redactions were made to remove pornographic content.

17. Attached as Exhibit 16 is a true and correct copy of the document request letter WellcomeMat served on Aylo on April 17, 2024.

18. Attached as Exhibit 17 is a true and correct copy of excerpts of Defendants' Objections and Responses to Plaintiff WellcomeMat's First Set of Interrogatories (Nos. 1-23), served on May 23, 2024.

19. Attached as Exhibit 18 is a true and correct copy of a Wiki Confluence document that Aylo produced to WellcomeMat on May 23, 2024, stamped by Aylo as AYLO0049062.

20. Attached as Exhibit 19 is a true and correct copy of excerpts of Aylo's First Supplemental Objections and Responses to Plaintiff WellcomeMat's Second Set of Venue Interrogatories (Nos. 4-5), served on June 4, 2024.

21. Attached as Exhibit 20 is a true and correct copy of excerpts of Aylo's First Set of Interrogatories (Nos. 1-17) to Plaintiff WellcomeMat, LLC, served on June 21, 2024.

I declare under penalty of perjury the foregoing is true and correct.

Executed this 27 day of June, 2024 in New York, New York.

/s/George R. El-Khoury  
George R. El-Khoury